

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF IOWA
EASTERN DIVISION**

MICHELLE L. BRANDT,

Plaintiff,

v.

CITY OF CEDAR FALLS, IOWA, LISA
ROEDING, JACQUE DANIELSEN, JOHN
BOSTWICK, JEFF OLSON, and JENNIFER
RODENBECK,

Defendants.

CASE NO.: _____

**LOCAL RULE 81(a) REMOVAL
INFORMATION FORM**

Defendants City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielsens, John Bostwick, Jeff Olson, and Jennifer Rodenbeck hereby submit the information required by Local Rule 81(a) in connection with their removal of this case to federal court:

1. All process, pleadings, and orders filed in the state court proceeding are attached hereto. These materials include:

Original Notice

Petition

Return of Original Notice – City of Cedar Falls

Return of Original Notice – J. Bostwick

Return of Original Notice – J. Danielsens

Return of Original Notice – J. Rodenbeck

Return of Original Notice – L. Roeding

Return of Original Notice – J. Olson

2. There are no known matters pending before the Iowa District Court that will require resolution by this Court, other than the claims asserted by the Plaintiff.

3. The following attorneys for plaintiff have appeared in the state court action:

Bruce H. Stoltze, Jr.
Stoltze & Stoltze, PLC

300 Walnut, Ste. 260
Des Moines, Iowa 50309
bj.stoltze@stoltzelaw.com

4. The following attorney for Defendants has appeared in the state court action in connection with filing the Notice of Removal as required by 28 U.S.C. § 1446(d):

Andrew T. Tice (AT0007968)
AHLERS & COONEY, P.C.
100 Court Avenue, Suite 600
Des Moines, Iowa 50309
(515) 243-7611
(515) 243-2149 (fax)
atice@ahlerslaw.com

/s/ Andrew T. Tice

Andrew Tice (AT0007968)
AHLERS & COONEY, P.C.
100 Court Avenue, Suite 600
Des Moines, Iowa 50309
Telephone: (515) 243-7611
Facsimile: (515) 243-2149
atice@ahlerslaw.com

ATTORNEYS FOR DEFENDANTS CITY OF
CEDAR FALLS, IOWA, LISA ROEDING,
JACQUE DANIELSEN, JOHN BOSTWICK,
JEFF OLSON, and JENNIFER RODENBECK

Electronically filed and served:

Bruce H. Stoltze, Jr.
Stoltze & Stoltze, PLC
300 Walnut, Ste. 260
Des Moines, Iowa 50309
bj.stoltze@stoltzelaw.com
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on: March 2, 2020

By: ☐ U.S. Mail ☐ Fax
☐ Hand delivery ☐ Private Carrier
☒ Electronically (via CM/ECF) ☐ E-mail

Signature: /s/ Pam Norelius

01690894-1\17071-1398

IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

MICHELLE BRANDT,

Plaintiff,

v.

CITY OF CEDAR FALLS, IOWA, LISA
ROEDING, JACQUE DANIELSEN,
JOHN BOSTWICK, JEFF OLSON, and
JENNIFER RODENBECK,

Defendants.

CIVIL NO. _____

ORIGINAL NOTICE

TO THE ABOVE-NAMED DEFENDANTS: City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielsen, John Bostwick, Jeff Olson, and Jennifer Rodenbeck.

YOU ARE HEREBY NOTIFIED that a petition has been filed in the office of the Clerk of this Court naming you as Defendants in this action. A copy of the Petition (and any documents filed with it) is attached to this notice. The attorneys for the Plaintiff are Bruce Stoltze, Jr., Stoltze & Stoltze, PLC, 300 Walnut, Suite 260, Des Moines, Iowa 50309. Plaintiff's attorney's telephone number is (515) 244-1473, facsimile is (515) 244-3930 and emails are: bj.stoltze@stoltzelaw.com.

You must serve a motion or answer within twenty (20) days after service of this Original Notice upon you and, within a reasonable time thereafter, file your Motion or Answer, with the Clerk of Court for Iowa District Court for Black Hawk, County, at the Courthouse in Waterloo, Iowa. If you do not, judgment by default will be rendered against you for the relief demanded in the Petition.

This case has been filed in a county that utilizes electronic filing. General rules and information on electronic filing are contained in Iowa Court Rules Chapter 16. Information regarding requirements related to the protection of personal information in court filings is contained in Iowa Court Rules Chapter 16, VI.

If you need assistance to participate in court because of a disability, immediately call the disability coordinator at 515-286-3394. Persons who are hearing or speech impaired, may call Relay Iowa TTY at 1-800-735-2942. Disability coordinators cannot provide legal advice.

IMPORTANT: YOU ARE ADVISED TO SEEK LEGAL ADVICE AT ONCE TO PROTECT YOUR INTERESTS

STATE OF IOWA JUDICIARY

Case No. LACV139168

County BlackHawk

Case Title M BRANDT VS CITY OF CEDAR FALLS ET AL.

THIS CASE HAS BEEN FILED IN A COUNTY THAT USES ELECTRONIC FILING.

Therefore, unless the attached Petition and Original Notice contains a hearing date for your appearance, or unless you obtain an exemption from the court, you must file your Appearance and Answer electronically.

You must register through the Iowa Judicial Branch website at <http://www.iowacourts.state.ia.us/Efile> and obtain a log in and password for the purposes of filing and viewing documents on your case and of receiving service and notices from the court.

FOR GENERAL RULES AND INFORMATION ON ELECTRONIC FILING, REFER TO THE IOWA COURT RULES CHAPTER 16 PERTAINING TO THE USE OF THE ELECTRONIC DOCUMENT MANAGEMENT SYSTEM:

<http://www.iowacourts.state.ia.us/Efile>

FOR COURT RULES ON PROTECTION OF PERSONAL PRIVACY IN COURT FILINGS, REFER TO DIVISION VI OF IOWA COURT RULES CHAPTER 16: <http://www.iowacourts.state.ia.us/Efile>

Scheduled Hearing:

If you require the assistance of auxiliary aids or services to participate in court because of a disability, immediately call your district ADA coordinator at (319) 833-3332 . (If you are hearing impaired, call Relay Iowa TTY at 1-800-735-2942.)

Date Issued 12/19/2019 10:15:21 AM



District Clerk of BlackHawk
/s/ Jessica Graham

County

IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

MICHELLE L. BRANDT,

Plaintiff,

vs.

CITY OF CEDAR FALLS, IOWA, LISA
ROEDING, JACQUE DANIELSEN,
JOHN BOSTWICK, JEFF OLSON, and
JENNIFER RODENBECK,

Defendants.

CIVIL NO. _____

PETITION AT LAW AND JURY DEMAND

COMES NOW the Plaintiff, Michelle L. Brandt, and for her cause of action against the Defendants City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielsen, John Bostwick, Jeff Olson, and Jennifer Rodenbeck respectfully states:

1. At all times pertinent herein the Plaintiff, Michelle L. Brandt, (hereinafter referred to as "Brandt") was and is an individual and resident of Bremer County, Iowa.
2. At all times pertinent herein the Defendant, City of Cedar Falls, Iowa, (hereinafter referred to as "Cedar Falls") was and is a municipality of the State of Iowa located in Blackhawk County, Iowa.
3. Upon information and belief, Defendant, Lisa Roeding (hereinafter referred to as "Roeding"), was at all times material hereto, Manager of Finance and Business Operations and/or City Treasurer for the City of Cedar Falls, Iowa.
4. Upon information and belief, Defendant Jacque Danielsen (hereinafter referred to as "Danielsen"), was at all times material hereto, Senior Secretary for the City of Cedar Falls, Iowa then later became the City Clerk of the City of Cedar Falls, Iowa.

5. Upon information and belief, Defendant John Bostwick (hereinafter referred to as "Bostwick"), was at all times material hereto, Acting Fire Chief for the City of Cedar Falls, Iowa and the Assistant Director of Public Safety Services.
6. Upon information and belief, Defendant Jeff Olson (hereinafter referred to as "Olson"), was at all times material hereto, Public Safety Director for the City of Cedar Falls, Iowa.
7. Upon information and belief, Defendant Jennifer Rodenbeck (hereinafter referred to as "Rodenbeck"), was at all times material hereto, Director of Finance and Business Operations for the City of Cedar Falls, Iowa.
8. Plaintiff has filed a complaint with the Iowa Civil Rights Commission and received a right-to-sue letter on September 19, 2019.

FACTUAL BACKGROUND

9. Plaintiff repleads and incorporates Paragraphs 1-8 and 31-80 as if pled here.
10. Plaintiff began her employment with the City of Cedar Falls on February 5th, 2001 as a part-time administrative clerk and was re-classed as a part-time secretary in July 2001.
11. In July 2014 Plaintiff's title changed to Administrative Clerk.
12. On March 8, 2010, Plaintiff transferred to the Fire Department.
13. From November 2014 through May 2017 there were five full-time job openings advertised. Plaintiff was on each Civil Service list and was only interviewed for three positions. She was passed by for these positions for three very different reasons.

14. In May, 2016, Plaintiff asked Jacque Daniels and Lisa Roeding, along with her supervisor at the time, Acting Fire Chief John Bostwick, why Plaintiff did not get the two positions and what she could do differently for the next full-time position.
15. Plaintiff received a Counseling Memo on July 7, 2016, listing out complaints made by her coworkers and supervisors. Plaintiff believes that her inquiry into why she did not receive a promotion sparked Defendant Bostwick to inquire to her co-workers and supervisors about any and all complaints related to her personality or performance.
16. In 2016, Plaintiff was working for both the Finance department and the Fire Department. This is when Plaintiff began working with Andrea Ludwig. Plaintiff taught her how to use the Fire House Software and other Fire Department duties.
17. In April, 2016 and July 2017 Brandt trained Marcie on the Fire Department duties.
18. In May, 2016, Plaintiff was told she had to go to Section 8 Housing Authority to help the Housing Specialist for that department get caught up in her work while she was also trying to complete the commercial inspections for the Fire Department. Plaintiff was unable to complete all work necessary for the commercial inspections and her hours were changed from 7:30pm – 1:30pm to 9am-3pm to help the Housing Specialist.
19. Plaintiff was then going to be transferred to the finance and Business Operations Department, but Angie Fordyce the Housing Specialist requested the transfer be delayed.

20. The request was approved by Defendants Bostwick, Roeding, and Rodenbeck.
21. On August 22, 2016 Plaintiff was transferred to the Finance and Business Operations Department.
22. She began working in Finance and Business Operations on August 22, 2017 and was told that she would be working one day a week in Public Records and her hours were again changed to 11:00 am – 5:00 pm Monday through Thursday and 12:00pm – 5:00pm on Fridays.
23. October 1, 2016 Plaintiff was given responsibilities for the background checks for the FBO Department for the Personnel Division's new and upcoming seasonal hires along with her other Finance duties.
24. Plaintiff was written up many times while going through her training process with the Finance Department for making mistakes that additional or adequate training would have prevented.
25. Defendant Roeding and Brenda Balvanz had a meeting with Plaintiff regarding medications that she was on and if they would affect her work performance. Plaintiff submitted a list of all medications she was taking for them to review. The City Attorney, Kevin Rogers, went over her medications and determined that none of her medications would cause side effects that would lead to the problems that were addressed in any of her previous warnings.
26. Plaintiff was told by fellow employees that Andrea Ludwig was asked to report and email every mistake made by Plaintiff to Defendant Roeding.

27. Plaintiff complained multiple times to Defendant Roeding about how she did not feel her training was adequate and that she felt she was being targeted by a hostile work environment.
28. Plaintiff began her training on cash receipts, statements and reconciling the Public Works statements with the FBO billing system in August, 2017 and was being trained by Andrea Ludwig. She went to Lisa at least three (3) separate times about the training being provided to her. She reported that Andrea was rude, snippy and most of the time answered her questions with another question or by referring her to the Accounting Manual. When Plaintiff had questions, she stopped asking Andrea and started asking Defendant Roeding.
29. Plaintiff applied for FMLA on August 11, 2016, for her TMD & TMJ conditions and to help take care of her mother.
30. Plaintiff met with Defendant Roeding and Brenda Balvanz where she was given notice that her FMLA was out dated. They asked the Plaintiff to remove her FMLA sick leave on her timesheet to personal sick leave. Defendant Roeding said that she did not know that Plaintiff was on FMLA and did not receive enough information from Plaintiff about her absence being FMLA. Plaintiff had applied for FMLA before being transferred to the Finance Department. Roeding and Balvanz requested that Plaintiff get a Medical Certification for her FMLA and FMLA to care for her mother. The FMLA certification was signed by both treating physicians on January 18, 2018 and on January 29, 2018.

31. Plaintiff was terminated from the position of Administrative Clerk with the City of Cedar Falls, Iowa on March 2, 2018. The reasons given for Plaintiff's termination was that she was late for work without calling or texting ahead of time, she was lacking job performance, and she did not ask for assistance.

**COUNT I – AGE DISCRIMINATION and FAILURE TO TRAIN/FAILURE TO
PROMOTE (IOWA CODE CHAPTER 216)**

32. Plaintiff repleads and incorporates Paragraphs 1-31 and Paragraphs 44-80 as if pled here.
33. Plaintiff applied for multiple full-time positions she was qualified for in her time with the City of Cedar Falls, Iowa.
34. Plaintiff was not given any of these positions that she applied for.
35. Plaintiff feels like she was not given a promotion or job positions that she has applied for due to her age.
36. Plaintiff is 56 years old.
37. Plaintiff was employed at City of Cedar Falls, Iowa from February 5, 2001 through March 2, 2018, and never received a promotion or was granted one of the multiple job positions that she had applied for.
38. The Defendants in this case treated the Plaintiff differently in the terms and conditions of her employment based on her age.
39. The actions of the Defendants were discriminatory to Plaintiff's age, to wit employees with less experience with City of Cedar Falls, Iowa, were receiving promotions and new positions over the Plaintiff.

40. Defendants' actions violated Iowa Code Chapter 216 in such other ways as the evidence may demonstrate.
41. Defendants terminated Plaintiff on the basis of her age.
42. Defendants' actions were the cause of damages to Plaintiff.
43. Plaintiff suffered damages as a result of the aforesaid age discrimination by Defendants.

WHEREFORE, the Plaintiff, Michelle L. Brandt, respectfully prays for judgment against Defendants City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielsen, John Bostwick, Jeff Olson, and Jennifer Rodenbeck in a sum deemed reasonable and proper for compensatory damages, and a sum deemed reasonable, for cost and interest and such other or further relief as just and proper.

COUNT II – DISCRIMINATION – REAL OR PERCEIVED DISABILITY
(IOWA CODE CHAPTER 216)

44. Plaintiff repleads and incorporates Paragraphs 1-43 and 53-80 as if pled here.
45. The Defendants in this case treated the Plaintiff differently in the terms and conditions of her employment based on her real or perceived disability.
46. Plaintiff has suffered from TMJ and TMD, Anxiety, and Depression during the course of her employment with the City of Cedar Falls, Iowa.
47. Plaintiff's anxiety is exacerbated by high stress situations. There were days at work where the stress was so much that Plaintiff suffered panic attacks and was visibly shaking from her anxiety.

48. Plaintiff was written up multiple times for absences related to medical appointment, some of which were FMLA absences.
49. Defendants' actions violated Iowa Code Chapter 216 in such other ways as the evidence may demonstrate.
50. Defendants terminated Plaintiff on the basis of her disability or their perception as to being disabled.
51. Defendants' actions were the cause of damages to Plaintiff.
52. Plaintiff suffered damages as a result of the aforesaid real or perceived disability discrimination by Defendants.

WHEREFORE, the Plaintiff, Michelle L. Brandt, respectfully prays for judgment against Defendants City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielson, John Bostwick, Jeff Olson, and Jennifer Rodenbeck in a sum deemed reasonable and proper for compensatory damages, and a sum deemed reasonable, for cost and interest and such other or further relief as just and proper.

**COUNT III – HOSTILE WORK ENVIRONMENT/HARRASMENT – AGE/DISABILITY
(IOWA CODE CHAPTER 216)**

53. Plaintiff repleads and incorporates Paragraphs 1-52 and 66-80 as if pled here.
54. The Defendants in this case created a hostile work environment for Brandt based on her age and real or perceived disability.
55. Plaintiff is 56 years old.
56. Plaintiff has suffered from TMJ and TMD, Anxiety, and Depression during the course of her employment with the City of Cedar Fall, Iowa.

57. The hostile work environment consisted of the facts alleged above.
58. The hostile work environment consisted of other such facts as the evidence will show.
59. Defendants harassed Plaintiff based on her age and real or perceived disability.
60. The Defendants actions violated Iowa Code Chapter 216.
61. The Defendants actions violated Iowa Code Chapter 216 in other ways as the evidence will show.
62. Plaintiff was terminated as a result of her harassment.
63. Defendants actions were the proximate cause of Plaintiff's damages.
64. Plaintiff suffered damages as a result of the aforementioned hostile work environment and harassment.
65. Plaintiff has suffered the damages of loss of past and future wages, benefits, and other expenses, damages to reputation, pain and suffering and has incurred attorney fees and expenses in such other proximate damages as shown by the evidence.

WHEREFORE, the Plaintiff, Michelle L. Brandt, respectfully prays for judgment against Defendants City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielson, John Bostwick, Jeff Olson, and Jennifer Rodenbeck in a sum deemed reasonable and proper for compensatory damages, and a sum deemed reasonable, for cost and interest and such other or further relief as just and proper.

COUNT IV – RETALIATION

(IOWA CODE CHAPTER 216)

66. Plaintiff repleads and incorporates paragraphs 1-67 and 76-80 as if pled here.
67. The Defendants in this case retaliated against Plaintiff by refusing to promote her, train her, and terminating her based on her age and real or perceived disability.
68. Plaintiff made complaints to Defendants in regards to not being considered or interviewed for the job promotions.
69. Plaintiff made complaints to Defendants multiple times about how she did not feel her training was adequate, that she was not promoted, that she was being discriminated against and that she was being harassed/was in a hostile work environment all on the basis of her age and disability/perceived disability.
70. Plaintiff began receiving discipline from the Defendants while she was taking FMLA.
71. Defendants' action's violated Iowa Code Chapter 216.
72. The Defendants' actions violated Iowa Code Chapter 216 in other ways as the evidence will show.
73. Defendants actions were the proximate cause of Plaintiff's damages.
74. Plaintiff suffered damages as a result of the aforementioned retaliation.
75. Plaintiff has suffered the damages of loss of past and future wages, benefits, and other expenses, damages to reputation, pain and suffering and has incurred attorney fees and expenses in such other proximate damages as shown by the evidence.

WHEREFORE, the Plaintiff, Michelle L. Brandt, respectfully prays for judgment against Defendants City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielson, John Bostwick,

Jeff Olson, and Jennifer Rodenbeck in a sum deemed reasonable and proper for compensatory damages, and a sum deemed reasonable and proper for punitive or exemplary damages, for cost and interest and such other or further relief as just and proper.

COUNT V: VIOLATION OF RIGHTS UNDER FAMILY MEDICAL LEAVE ACT

76. Plaintiff repleads and incorporates Paragraphs 1-75 as if pled here.
77. The Defendant's actions in disciplining and terminating the Plaintiff were on the basis of age and real or perceived disability, and her usage of FMLA leave, and in violation of Plaintiff's substantial rights under the Family Medical Leave Act, 29 U.S.C. §2601 et.seq.
78. The Defendants actions were both in violation of the Family Medical Leave Act in interfering and in retaliation for the Plaintiff exercising her rights pursuant to the Family Medical Leave Act.
79. As a proximate cause of the defendant's actions, plaintiff has suffered general and special damages including past and continuing lost wages and benefits.
80. The actions of the Defendant were willful and wanton which warrant an award of punitive and/or liquidated damages.

WHEREFORE, the Plaintiff, Michelle L. Brandt, respectfully prays for judgment against Defendants City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielson, John Bostwick, Jeff Olson, and Jennifer Rodenbeck in a sum deemed reasonable and proper for compensatory damages, and a sum deemed reasonable and proper for punitive, liquidated or exemplary damages, for cost and interest and such other or further relief as just and proper.

Respectfully Submitted,

By: /s/ Bruce H. Stoltze, Jr.
Bruce H. Stoltze, Jr. (AT0010694)
Stoltze & Stoltze, PLC
300 Walnut, Suite 260
Des Moines, Iowa 50309
Telephone: 515-244-1473
Facsimile: 515-244-3930
E-mail:bj.stoltze@stoltzelaw.com
ATTORNEY FOR PLAINTIFF

JURY DEMAND

COMES NOW the Plaintiff, Michelle L. Brandt, and hereby demands a trial by jury of all issues properly triable to a jury.

Respectfully Submitted,

By: /s/ Bruce H. Stoltze, Jr.
Bruce H. Stoltze, Jr. (AT0010694)
Stoltze & Stoltze, PLC
300 Walnut, Suite 260
Des Moines, Iowa 50309
Telephone: 515-244-1473
Facsimile: 515-244-3930
E-mail:bj.stoltze@stoltzelaw.com
ATTORNEY FOR PLAINTIFF

CVPS, LLC

1729 FALLS AVE STE D
WATERLOO IA 50701
(319) 234-1407

A SCANNED COPY OF THIS DOCUMENT
WAS FILED WITH THE IOWA EDMS.

AFFIDAVIT OF RETURN OF SERVICE

STATE OF IOWA

BLACK HAWK COUNTY)ss

I, the undersigned, being duly sworn on oath do hereby depose and state that I received the attached notice order, and/or other document(s) on the 12 day of FEBRUARY, 20 20, that on the 12 day of FEBRUARY, 20 20

I served on the within-named CITY OF CITY FALLS

at 220 CLAY ST in CEDAR FALLS in BLACK HAWK County, Iowa

by delivering a true and identical copy of each such item in the following manner:

- I served the same by delivering a copy thereof to the above person(s) personally.
- I served the same on the above person at the above person's dwelling house or usual place of abode (which place was not a rooming house, hotel, club or apartment building) by there delivering a copy thereof to the individual named below, a person who was then at least 18 years old.
- I served the same on the above person at the above person's dwelling, house or usual of abode (which place was a rooming house, hotel, club or apartment) by there delivering a copy thereof to a member of the family or manager, clerk, proprietor, custodian or person(s) in possession named and described below, a person who was then at least 18 years old.
- ☒ I served the above person(s), company and/or corporation by delivering a copy to the person named and described below. Said service was made at the address shown below, if any, otherwise at the address above.

ROB GREEN, MAYOR, SIGNED FOR AND ACCEPTED SERVICE ON BEHALF OF THE

CITY OF CEDAR FALLS.

Rule 1.302(5) Original notices may be served by any person who is neither a party nor the attorney for a party to the action. A party or party's agent may take an acknowledgment of service and deliver a copy of the original notice

NAME AND TITLE OR RELATIONSHIP OF INDIVIDUAL SERVED (IF NOT SHOWN ABOVE)

Description of Person Served:

☒ M ☐ F Ethnicity/Skin Color White Age 50's Height 5' 11" Weight 195lbs Hair Color Brown

Beard/Mustache ☐ Y ☒ N Glasses ☐ Y ☒ N

SERVICE TIME 4:03PM

CVPS FILE NO. 20-466

ORIGINAL NOTICE AND PETITION AT LAW
PROCESS TYPE AND JURY DEMAND

CASE NO. LACV139168

SUBSCRIBED AND SWORN TO BEFORE ME THE SAID

KIM BUENZOW

THIS 13 DAY OF FEBRUARY, 20 20

BY Kim Buenzow

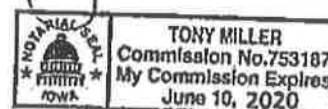
KIM BUENZOW, PROCESS SERVER



CVPS, LLC
TAX ID: 46-1053224
cvps@cvpsllc.net
www.cvpsllc.net

Tony Miller

NOTARY PUBLIC



IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

MICHELLE BRANDT,

Plaintiff,

v.

CITY OF CEDAR FALLS, IOWA, LISA
ROEDING, JACQUE DANIELSEN,
JOHN BOSTWICK, JEFF OLSON, and
JENNIFER RODENBECK,

Defendants.

CIVIL NO. _____

ORIGINAL NOTICE

TO THE ABOVE-NAMED DEFENDANTS: City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielsen, John Bostwick, Jeff Olson, and Jennifer Rodenbeck.

YOU ARE HEREBY NOTIFIED that a petition has been filed in the office of the Clerk of this Court naming you as Defendants in this action. A copy of the Petition (and any documents filed with it) is attached to this notice. The attorneys for the Plaintiff are Bruce Stoltze, Jr., Stoltze & Stoltze, PLC, 300 Walnut, Suite 260, Des Moines, Iowa 50309. Plaintiff's attorney's telephone number is (515) 244-1473, facsimile is (515) 244-3930 and emails are: bj.stoltze@stoltzelaw.com.

You must serve a motion or answer within twenty (20) days after service of this Original Notice upon you and, within a reasonable time thereafter, file your Motion or Answer, with the Clerk of Court for Iowa District Court for Black Hawk, County, at the Courthouse in Waterloo, Iowa. If you do not, judgment by default will be rendered against you for the relief demanded in the Petition.

This case has been filed in a county that utilizes electronic filing. General rules and information on electronic filing are contained in Iowa Court Rules Chapter 16. Information regarding requirements related to the protection of personal information in court filings is contained in Iowa Court Rules Chapter 16, VI.

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**IMPORTANT: YOU ARE ADVISED TO SEEK LEGAL ADVICE AT ONCE TO PROTECT
YOUR INTERESTS**

ORIGINAL NOTICE AND PETITION AT LAW AND JURY DEMAND

INDEX/CASE# LACV139168

JOB#

CVPS TRIP SHEET

FILE NO. 20-466

DATE RECEIVED: 2-12-20

TIME: 2:30PM

DATE	TIME	ADDRESS	COMMENTS
1 2/12/20	4:23pm	220 Clay St	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			

PERSON TO BE SERVED: CITY OF CEDAR FALLS- ROB GREEN

SIGNATURE: RonnieThe above signed individual, acknowledges they have received ☒ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 copies of service☒ M ☐ F Ethnicity W Age 50 Height 5' 11" Weight 195 lbs Hair Color BrownBeard/Mustache ☐ Y ☒ N Glasses ☐ Y ☒ N

PERSON REQUESTING SERVICE: 515-244-1473

STOLTZE & STOLTZE, PL ATTORNEYS AT LAW 300 WALNUT SUITE 260 DES MOINES IA 50309

ADDRESS TO BE SERVED: 220 CLAY ST

CEDAR FALLS IA 50613

SPECIAL INSTRUCTIONS:

PAIDS 55.00

CHECK#

DATE: 2-12-20

CVPS, LLC1729 FALLS AVE STE D
WATERLOO IA 50701
(319) 234-1407A SCANNED COPY OF THIS DOCUMENT
WAS FILED WITH THE IOWA EDMS.**AFFIDAVIT OF RETURN OF SERVICE**STATE OF IOWA)
)BLACK HAWK COUNTY)ssI, the undersigned, being duly sworn on oath do hereby depose and state that I received the attached notice order, and/or other document(s) on the 12 day of FEBRUARY, 20 20, that on the 13 day of FEBRUARY, 20 20,I served on the within-named JOHN BOSTWICKat 4600 MAIN ST, in CEDAR FALLS in BLACK HAWK County, Iowa
by delivering a true and identical copy of each such item in the following manner:

- ☒ I served the same by delivering a copy thereof to the above person(s) personally.
- ☐ I served the same on the above person at the above person's dwelling house or usual place of abode (which place was not a rooming house, hotel, club or apartment building) by there delivering a copy thereof to the individual named below, a person who was then at least 18 years old.
- ☐ I served the same on the above person at the above person's dwelling, house or usual of abode (which place was a rooming house, hotel, club or apartment) by there delivering a copy thereof to a member of the family or manager, clerk, proprietor, custodian or person(s) in possession named and described below, a person who was then at least 18 years old.
- ☐ I served the above person(s), company and/or corporation by delivering a copy to the person named and described Below. Said service was made at the address shown below, if any, otherwise at the address above.

Rule 1.302(5) Original notices may be served by any person who is neither a party nor the attorney for a party to the action. A party or party's agent may take an acknowledgment of service and deliver a copy of the original notice

NAME AND TITLE OR RELATIONSHIP OF INDIVIDUAL SERVED (IF NOT SHOWN ABOVE)

Description of Person Served:

☒ M ☐ F Ethnicity/ Skin Color White Age 60's Height 5' 11" Weight 185lbs Hair Color Grey

Beard/Mustache ☐ Y ☒ N Glasses ☒ Y ☐ N

SERVICE TIME 1:14PMCVPS FILE NO. 20-465ORIGINAL NOTICE; PETITION AT LAW
PROCESS TYPE AND JURY DEMANDCASE NO. LACV139168

SUBSCRIBED AND SWORN TO BEFORE ME THE SAID

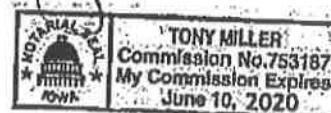
KIM BUENZOW

THIS 14 DAY OF FEBRUARY, 20 20
CVPS, LLC
 TAX ID: 46-1053224
 cvps@cvpsllc.net
 www.cvpsllc.net
BY Kim Buenow

KIM BUENZOW, PROCESS SERVER

A handwritten signature of Kim Buenow in black ink.

NOTARY PUBLIC



IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

MICHELLE BRANDT,

Plaintiff,

v.

CITY OF CEDAR FALLS, IOWA, LISA
ROEDING, JACQUE DANIELSEN,
JOHN BOSTWICK, JEFF OLSON, and
JENNIFER RODENBECK,

Defendants.

CIVIL NO. _____

ORIGINAL NOTICE

TO THE ABOVE-NAMED DEFENDANTS: City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielson, John Bostwick, Jeff Olson, and Jennifer Rodenbeck.

YOU ARE HEREBY NOTIFIED that a petition has been filed in the office of the Clerk of this Court naming you as Defendants in this action. A copy of the Petition (and any documents filed with it) is attached to this notice. The attorneys for the Plaintiff are Bruce Stoltze, Jr., Stoltze & Stoltze, PLC, 300 Walnut, Suite 260, Des Moines, Iowa 50309. Plaintiff's attorney's telephone number is (515) 244-1473, facsimile is (515) 244-3930 and emails are: bj.stoltze@stoltzelaw.com.

You must serve a motion or answer within twenty (20) days after service of this Original Notice upon you and, within a reasonable time thereafter, file your Motion or Answer, with the Clerk of Court for Iowa District Court for Black Hawk, County, at the Courthouse in Waterloo, Iowa. If you do not, judgment by default will be rendered against you for the relief demanded in the Petition.

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If you need assistance to participate in court because of a disability, immediately call the disability coordinator at 515-286-3394. Persons who are hearing or speech impaired, may call Relay Iowa TTY at 1-800-735-2942. Disability coordinators cannot provide legal advice.

IMPORTANT: YOU ARE ADVISED TO SEEK LEGAL ADVICE AT ONCE TO PROTECT YOUR INTERESTS

ORIGINAL NOTICE AND PETITION AT LAW AND JURY DEMAND

INDEX/CASE# LACV139168

JOB#

CVPS TRIP SHEET

FILE NO. 20-465

DATE RECEIVED: 2-12-20

TIME: 2:30PM

DATE	TIME	ADDRESS	COMMENTS
1 2/12/20	4:15pm	1830 Crescent Dr	
2 2/12/20	4:21pm	4031 Pheasant Dr	
3 2/13/20	1:14pm	4600 main St	
4			
5			
6			
7			
8			
9			
10			
11			

PERSON TO BE SERVED: JOHN BOSTWICK

SIGNATURE: The above signed individual, acknowledges they have received ☒ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 copies of service

☒ M ☐ F Ethnicity W Age 60 Height 5'11" Weight 185 lbs Hair Color Gray
 Beard/Mustache ☐ Y ☒ N Glasses ☒ Y ☐ N

PERSON REQUESTING SERVICE: 515-244-1473

STOLTZE & STOLTZE, PL ATTORNEYS AT LAW 300 WALNUT SUITE 260 DES MOINES IA 50309

ADDRESS TO BE SERVED: 1830 CRESCENT DR

CEDAR FALLS IA 50613

SPECIAL INSTRUCTIONS:

PAID \$ 55.00

CHECK#

DATE: 2-12-20

CVPS, LLC

1729 FALLS AVE STE D

WATERLOO IA 50701

(319) 234-1407

A SCANNED COPY OF THIS DOCUMENT
WAS FILED WITH THE IOWA EDMS.**AFFIDAVIT OF RETURN OF SERVICE**

STATE OF IOWA)

)

BLACK HAWK

COUNTY)ss

I, the undersigned, being duly sworn on oath do hereby depose and state that I received the attached notice order, and/or other document(s) on the 12 day of FEBRUARY, 20 20, that on the 13 day of FEBRUARY, 20 20, I served on the within-named JACQUE DANIELSEN

at 220 CLAY ST, in CEDAR FALLS in BLACK HAWK County, Iowa
by delivering a true and identical copy of each such item in the following manner:

☒ I served the same by delivering a copy thereof to the above person(s) personally.

☐ I served the same on the above person at the above person's dwelling house or usual place of abode (which place was not a rooming house, hotel, club or apartment building) by there delivering a copy thereof to the individual named below, a person who was then at least 18 years old.

☐ I served the same on the above person at the above person's dwelling, house or usual of abode (which place was a rooming house, hotel, club or apartment) by there delivering a copy thereof to a member of the family or manager, clerk, proprietor, custodian or person(s) in possession named and described below, a person who was then at least 18 years old.

☐ I served the above person(s), company and/or corporation by delivering a copy to the person named and described Below. Said service was made at the address shown below, if any, otherwise at the address above.

Rule 1.302(5) Original notices may be served by any person who is neither a party nor the attorney for a party to the action. A party or party's agent may take an acknowledgment of service and deliver a copy of the original notice

NAME AND TITLE OR RELATIONSHIP OF INDIVIDUAL SERVED (IF NOT SHOWN ABOVE)

Description of Person Served:

☐ M ☒ F Ethnicity/ Skin Color White Age 50's Height 5' 3" Weight 120lbs Hair Color Blonde
Beard/Mustache ☐ Y ☒ N Glasses ☒ Y ☐ N

SERVICE TIME 1:25PMCVPS FILE NO. 20-468

ORIGINAL NOTICE; PETITION AT LAW
PROCESS TYPE AND JURY DEMAND

CASE NO. LACV139168

SUBSCRIBED AND SWORN TO BEFORE ME THE SAID

KIM BUENZOW

THIS 14 DAY OF FEBRUARY, 20 20.**CVPS, LLC**

TAX ID: 46-1053224

cvps@cvpsllc.net

www.cvpsllc.net

BY Kim Buenzow
KIM BUENZOW, PROCESS SERVER

[Signature]
NOTARY PUBLIC



IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

MICHELLE BRANDT,

Plaintiff,

v.

CITY OF CEDAR FALLS, IOWA, LISA
ROEDING, JACQUE DANIELSEN,
JOHN BOSTWICK, JEFF OLSON, and
JENNIFER RODENBECK,

Defendants.

CIVIL NO. _____

ORIGINAL NOTICE

TO THE ABOVE-NAMED DEFENDANTS: City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielsen, John Bostwick, Jeff Olson, and Jennifer Rodenbeck.

YOU ARE HEREBY NOTIFIED that a petition has been filed in the office of the Clerk of this Court naming you as Defendants in this action. A copy of the Petition (and any documents filed with it) is attached to this notice. The attorneys for the Plaintiff are Bruce Stoltze, Jr., Stoltze & Stoltze, PLC, 300 Walnut, Suite 260, Des Moines, Iowa 50309. Plaintiff's attorney's telephone number is (515) 244-1473, facsimile is (515) 244-3930 and emails are: bj.stoltze@stoltzelaw.com.

You must serve a motion or answer within twenty (20) days after service of this Original Notice upon you and, within a reasonable time thereafter, file your Motion or Answer, with the Clerk of Court for Iowa District Court for Black Hawk, County, at the Courthouse in Waterloo, Iowa. If you do not, judgment by default will be rendered against you for the relief demanded in the Petition.

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If you need assistance to participate in court because of a disability, immediately call the disability coordinator at 515-286-3394. Persons who are hearing or speech impaired, may call Relay Iowa TTY at 1-800-735-2942. Disability coordinators cannot provide legal advice.

IMPORTANT: YOU ARE ADVISED TO SEEK LEGAL ADVICE AT ONCE TO PROTECT YOUR INTERESTS

ORIGINAL NOTICE AND PETITION AT LAW AND JURY DEMAND			
INDEX/CASE# LACV139168		JOB#	
CVPS TRIP SHEET			
FILE NO. 20-468		DATE RECEIVED: 2-12-20	
TIME: 2:30PM			
DATE	TIME	ADDRESS	COMMENTS
1 2/12/20	4:00pm	921 W 3rd St	
2 2/13/20	1:25pm	220 Clay St	
3			
4			
5			
6			
7			
8			
9			
10			
11			
PERSON TO BE SERVED: JACQUE DANIELSEN			
SIGNATURE: <i>Jacqueline Nielsen</i>			
The above signed individual acknowledges they have received <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 copies of service			
<input type="checkbox"/> M <input checked="" type="checkbox"/> F Ethnicity <u>W</u> Age <u>56</u> Height <u>5'3"</u> Weight <u>120</u> lbs Hair Color <u>Blond</u>			
Beard/Mustache <input type="checkbox"/> Y <input checked="" type="checkbox"/> N Glasses <input checked="" type="checkbox"/> Y <input type="checkbox"/> N			
PERSON REQUESTING SERVICE: 515-244-1473			
STOLTZE & STOLTZE, PL ATTORNEYS AT LAW 300 WALNUT SUITE 260 DES MOINES IA 50309			
ADDRESS TO BE SERVED: 921 W 3RD ST			
CEDAR FALLS IA 50613			
SPECIAL INSTRUCTIONS:			
PAID\$ 55.00		CHECK#	DATE: 2-12-20

CVPS, LLCA SCANNED COPY OF THIS DOCUMENT
WAS FILED WITH THE IOWA EDMS.1729 FALLS AVE STE D
WATERLOO IA 50701
(319) 234-1407**AFFIDAVIT OF RETURN OF SERVICE**STATE OF IOWA)
)BLACK HAWK COUNTY)ssI, the undersigned, being duly sworn on oath do hereby depose and state that I received the attached notice order, and/or other document(s) on the 12 day of FEBRUARY, 20 20, that on the 13 day of FEBRUARY, 20 20, I served on the within-named JENNIFER RODENBECKat 220 CLAY ST in CEDAR FALLS in BLACK HAWK County, Iowa
by delivering a true and identical copy of each such item in the following manner:☒ I served the same by delivering a copy thereof to the above person(s) personally.☐ I served the same on the above person at the above person's dwelling house or usual place of abode (which place was not a rooming house, hotel, club or apartment building) by there delivering a copy thereof to the individual named below, a person who was then at least 18 years old.☐ I served the same on the above person at the above person's dwelling, house or usual of abode (which place was a rooming house, hotel, club or apartment) by there delivering a copy thereof to a member of the family or manager, clerk, proprietor, custodian or person(s) in possession named and described below, a person who was then at least 18 years old.☐ I served the above person(s), company and/or corporation by delivering a copy to the person named and described Below. Said service was made at the address shown below, if any, otherwise at the address above.

Rule 1.302(5) Original notices may be served by any person who is neither a party nor the attorney for a party to the action. A party or party's agent may take an acknowledgment of service and deliver a copy of the original notice

NAME AND TITLE OR RELATIONSHIP OF INDIVIDUAL SERVED (IF NOT SHOWN ABOVE)

Description of Person Served:

☐ M ☒ F Ethnicity/ Skin Color White Age 50's Height 5' 6" Weight 150lbs Hair Color Blonde
Beard/Mustache ☐ Y ☒ N Glasses ☒ Y ☐ NSERVICE TIME 12:55PMCVPS FILE NO. 20-463ORIGINAL NOTICE; PETITION AT LAW
PROCESS TYPE AND JURY DEMANDCASE NO. LACV139168

SUBSCRIBED AND SWORN TO BEFORE ME THE SAID

KIM BUENZOW

THIS 14 DAY OF FEBRUARY, 20 20.**CVPS, LLC**
TAX ID: 46-1053224
cvps@cvpsllc.net
www.cvpsllc.netBY Kim Buenzow

KIM BUENZOW, PROCESS SERVER

NOTARY PUBLIC



IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

MICHELLE BRANDT,

Plaintiff,

v.

CITY OF CEDAR FALLS, IOWA, LISA
ROEDING, JACQUE DANIELSEN,
JOHN BOSTWICK, JEFF OLSON, and
JENNIFER RODENBECK,

Defendants.

CIVIL NO. _____

ORIGINAL NOTICE

TO THE ABOVE-NAMED DEFENDANTS: City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielson, John Bostwick, Jeff Olson, and Jennifer Rodenbeck.

YOU ARE HEREBY NOTIFIED that a petition has been filed in the office of the Clerk of this Court naming you as Defendants in this action. A copy of the Petition (and any documents filed with it) is attached to this notice. The attorneys for the Plaintiff are Bruce Stoltze, Jr., Stoltze & Stoltze, PLC, 300 Walnut, Suite 260, Des Moines, Iowa 50309. Plaintiff's attorney's telephone number is (515) 244-1473, facsimile is (515) 244-3930 and emails are: bj.stoltze@stoltzelaw.com.

You must serve a motion or answer within twenty (20) days after service of this Original Notice upon you and, within a reasonable time thereafter, file your Motion or Answer, with the Clerk of Court for Iowa District Court for Black Hawk, County, at the Courthouse in Waterloo, Iowa. If you do not, judgment by default will be rendered against you for the relief demanded in the Petition.

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IMPORTANT: YOU ARE ADVISED TO SEEK LEGAL ADVICE AT ONCE TO PROTECT YOUR INTERESTS

ORIGINAL NOTICE AND PETITION AT LAW AND JURY DEMAND			
INDEX/CASE# LACV139168		JOB#	
CVPS TRIP SHEET			
FILE NO. 20-463		DATE RECEIVED: 2-12-20	
		TIME: 2:30PM	
DATE	TIME	ADDRESS	COMMENTS
1 2/13/20	10:55 am	1758 200th St	Waverly
2 2/13/20	12:55 pm	220 clay St	CF
3			
4			
5			
6			
7			
8			
9			
10			
11			
PERSON TO BE SERVED: JENNIFER RODENBECK			
SIGNATURE: <i>Jennifer Rodenbeck</i>			
The above signed individual, acknowledges they have received <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 copies of service			
<input type="checkbox"/> M <input checked="" type="checkbox"/> F Ethnicity <i>W</i> Age <i>58</i> Height <i>5'6"</i> Weight <i>150</i> lbs Hair Color <i>Brown</i>			
Beard/Mustache <input type="checkbox"/> Y <input checked="" type="checkbox"/> N Glasses <input checked="" type="checkbox"/> Y <input type="checkbox"/> N			
PERSON REQUESTING SERVICE: 515-244-1473			
STOLTZE & STOLTZE, PL ATTORNEYS AT LAW 300 WALNUT SUITE 260 DES MOINES IA 50309			
ADDRESS TO BE SERVED: 1758 200TH ST			
WAVERLY IA 50677			
SPECIAL INSTRUCTIONS:			
PAID\$ 104.00	CHECK#		DATE: 2-12-20

CVPS, LLC1729 FALLS AVE STE D
WATERLOO IA 50701
(319) 234-1407A SCANNED COPY OF THIS DOCUMENT
WAS FILED WITH THE IOWA EDMS.**AFFIDAVIT OF RETURN OF SERVICE**STATE OF IOWA)
)BLACK HAWK COUNTY)ssI, the undersigned, being duly sworn on oath do hereby depose and state that I received the attached notice order, and/or other document(s) on the 12 day of FEBRUARY, 20 20, that on the 14 day of FEBRUARY, 20 20I served on the within-named LISA ROEDINGat 220 CLAY ST, in CEDAR FALLS in BLACK HAWK County, Iowa
by delivering a true and identical copy of each such item in the following manner:☒ I served the same by delivering a copy thereof to the above person(s) personally.☐ I served the same on the above person at the above person's dwelling house or usual place of abode (which place was not a rooming house, hotel, club or apartment building) by there delivering a copy thereof to the individual named below, a person who was then at least 18 years old.☐ I served the same on the above person at the above person's dwelling, house or usual of abode (which place was a rooming house, hotel, club or apartment) by there delivering a copy thereof to a member of the family or manager, clerk, proprietor, custodian or person(s) in possession named and described below, a person who was then at least 18 years old.☐ I served the above person(s), company and/or corporation by delivering a copy to the person named and described Below. Said service was made at the address shown below, if any, otherwise at the address above.

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NAME AND TITLE OR RELATIONSHIP OF INDIVIDUAL SERVED (IF NOT SHOWN ABOVE)

Description of Person Served:

☐ M ☒ F Ethnicity/ Skin Color White Age 50's Height 5' 7" Weight 145 lbs Hair Color Brown
Beard/Mustache ☐ Y ☒ N Glasses ☒ Y ☐ NSERVICE TIME 12:42PMCVPS FILE NO. 20-464ORIGINAL NOTICE AND PEITION AT LAW
PROCESS TYPE AND JURY DEMANDCASE NO. LACV139168

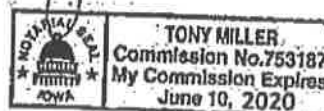
SUBSCRIBED AND SWORN TO BEFORE ME THE SAID

KIM BUENZOW

THIS 17 DAY OF FEBRUARY, 20 20**CVPS, LLC**
TAX ID: 46-1053224
cvps@cvpsllc.net
www.cvpsllc.netBY Kim Buenzow

KIM BUENZOW, PROCESS SERVER

NOTARY PUBLIC



IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

MICHELLE BRANDT,

Plaintiff,

v.

CITY OF CEDAR FALLS, IOWA, LISA
ROEDING, JACQUE DANIELSEN,
JOHN BOSTWICK, JEFF OLSON, and
JENNIFER RODENBECK,

Defendants.

CIVIL NO. _____

ORIGINAL NOTICE

TO THE ABOVE-NAMED DEFENDANTS: City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielson, John Bostwick, Jeff Olson, and Jennifer Rodenbeck.

YOU ARE HEREBY NOTIFIED that a petition has been filed in the office of the Clerk of this Court naming you as Defendants in this action. A copy of the Petition (and any documents filed with it) is attached to this notice. The attorneys for the Plaintiff are Bruce Stoltze, Jr., Stoltze & Stoltze, PLC, 300 Walnut, Suite 260, Des Moines, Iowa 50309. Plaintiff's attorney's telephone number is (515) 244-1473, facsimile is (515) 244-3930 and emails are: bj.stoltze@stoltzelaw.com.

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ORIGINAL NOTICE AND PETITION AT LAW AND JURY DEMAND

INDEX/CASE# LACV139168

JOB#

CVPS TRIP SHEET

FILE NO. 20-464

DATE RECEIVED: 2-12-20

TIME: 2:30PM

DATE	TIME	ADDRESS	COMMENTS
1 2/13/20	1:00pm	220 clay St	CF
2 2/14/20	12:52pm	"	"
3			
4			
5			
6			
7			
8			
9			
10			
11			

PERSON TO BE SERVED: LISA ROEDING

SIGNATURE: *Lisa Roeding*The above signed individual, acknowledges they have received ☒ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 copies of service☐ M ☒ F Ethnicity W Age 55 Height 5'7" Weight 145 lbs Hair Color BrownBeard/Mustache ☐ Y ☒ N Glasses ☒ Y ☐ N

PERSON REQUESTING SERVICE: 515-244-1473

STOLTZE & STOLTZE, PL ATTORNEYS AT LAW 300 WALNUT SUITE 260 DES MOINES IA 50309

ADDRESS TO BE SERVED: 702 PARK ST

REINBECK IA 50669

SPECIAL INSTRUCTIONS:

PAID \$ 86.50

CHECK#

DATE: 2-12-20

CVPS, LLC1729 FALLS AVE STE D
WATERLOO IA 50701
(319) 234-1407A SCANNED COPY OF THIS DOCUMENT
WAS FILED WITH THE IOWA EDMS.**AFFIDAVIT OF RETURN OF SERVICE**

STATE OF IOWA)

)

BLACK HAWK

COUNTY)ss

I, the undersigned, being duly sworn on oath do hereby depose and state that I received the attached notice order, and/or other document(s) on the 12 day of FEBRUARY, 20 20, that on the 14 day of FEBRUARY, 20 20, I served on the within-named JEFF OLSON, DIRECTOR OF PUBLIC SAFETY

at 220 CLAY ST, in CEDAR FALLS in BLACK HAWK County, Iowa

by delivering a true and identical copy of each such item in the following manner:

☒ I served the same by delivering a copy thereof to the above person(s) personally.

☐ I served the same on the above person at the above person's dwelling house or usual place of abode (which place was not a rooming house, hotel, club or apartment building) by there delivering a copy thereof to the individual named below, a person who was then at least 18 years old.

☐ I served the same on the above person at the above person's dwelling, house or usual of abode (which place was a rooming house, hotel, club or apartment) by there delivering a copy thereof to a member of the family or manager, clerk, proprietor, custodian or person(s) in possession named and described below, a person who was then at least 18 years old.

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NAME AND TITLE OR RELATIONSHIP OF INDIVIDUAL SERVED (IF NOT SHOWN ABOVE)

Description of Person Served:

☒ M ☐ F Ethnicity/ Skin Color White Age 60's Height 6' 2" Weight 195lbs Hair Color Brown

Beard/Mustache ☐ Y ☒ N Glasses ☐ Y ☒ N

SERVICE TIME 1:26PM

CVPS FILE NO. 20-467

PROCESS TYPE ORIGINAL NOTICE AND PETITION AT LAW
AND JURY DEMAND

CASE NO. LACV139168

BY Kim Buenzow

KIM BUENZOW, PROCESS SERVER

SUBSCRIBED AND SWORN TO BEFORE ME THE SAID

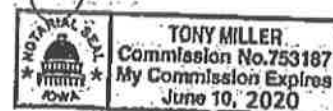
KIM BUENZOW

THIS 17 DAY OF FEBRUARY, 20 20



CVPS, LLC
TAX ID: 46-1053224
cvps@cvpsllc.net
www.cvpsllc.net

[Signature]
NOTARY PUBLIC



IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

MICHELLE BRANDT,

Plaintiff,

v.

CITY OF CEDAR FALLS, IOWA, LISA
ROEDING, JACQUE DANIELSEN,
JOHN BOSTWICK, JEFF OLSON, and
JENNIFER RODENBECK,

Defendants.

CIVIL NO. _____

ORIGINAL NOTICE

TO THE ABOVE-NAMED DEFENDANTS: City of Cedar Falls, Iowa, Lisa Roeding, Jacque Danielsen, John Bostwick, Jeff Olson, and Jennifer Rodenbeck.

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ORIGINAL NOTICE AND PETITION AT LAW AND JURY DEMAND

INDEX/CASE# LACV139168

JOB#

CVPS TRIP SHEET

FILE NO. 20-467

DATE RECEIVED: 2-12-20

TIME: 2:30PM

DATE	TIME	ADDRESS	COMMENTS
12/13/20	1:15pm		4600 main st
22/14/20	1:26pm		220 Clay St
3			
4			
5			
6			
7			
8			
9			
10			
11			

PERSON TO BE SERVED: JEFF OLSON- DIRECTOR OF PUBLIC SAFETY

SIGNATURE: The above signed individual acknowledges they have received ☒ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 copies of service☒ M ☐ F Ethnicity W Age 40 Height 6'2" Weight 195 lbs Hair Color BrownBeard/Mustache ☐ Y ☒ N Glasses ☐ Y ☒ N

PERSON REQUESTING SERVICE: 515-244-1473

STOLTZE & STOLTZE, PL ATTORNEYS AT LAW 300 WALNUT SUITE 260 DES MOINES IA 50309

ADDRESS TO BE SERVED: 4600 MAIN ST

CEDAR FALLS IA 50613

SPECIAL INSTRUCTIONS:

PAIDS \$55.00

CHECK#

DATE: 2-12-20